

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean P. Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

September 26, 2024

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
Partial Final Judgments on Punitive Damages

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") respectfully request a two-week extension, from September 27, 2024 to October 11, 2024, for the PECs to provide the input requested in the Court's order at ECF No. 10350 (Sept. 12, 2024). In that order, the Court sought the PECs' input regarding (1) whether now is the appropriate time for the Court to begin considering motions for punitive damages and/or final judgments; and (2) if so, what information should be before the Court in order for the Court to properly adjudicate such motions, and also (3) how best to administer such motion practice. The PECs have found the additional time to be necessary to coordinate the views of the various Plaintiffs counsel into a consolidated view for recommendation to the Court. In addition, during the period of coordination, several attorneys engaged in the dialogue are traveling and preparing for Second Circuit arguments.

Respectfully submitted,

MOTLEY RICE LLC

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*Liaison Counsel of the Plaintiffs' Executive Committee for
Personal Injury and Death Claims on behalf of the Plaintiffs*

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record, via ECF